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Attorneys for Defendant, PA SOLUTIONS, INC.

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

CAMERON DYESS, an individual,

Plaintiff,

vs.

ESTATE OF JAJUAN LEE MORTON,
Deceased; DONYELL SHAJUAN
HANKINS as Personal Representative of
the ESTATE OF JAJUAN LEE MORTON,
Deceased; PA SOLUTIONS, INC., a
Michigan Corporation; and DOES 1 through
20, inclusive,

Defendants.

CASE NO. 4:20-cv-00909-HSG
*[Assigned for All Purposes to the Honorable
Haywood S. Gilliam, Jr.; Courtroom 2]*

**STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINE TO
MEDIATE & ORDER THEREON**

Action Filed: November 22, 2019
Trial Date: November 8, 2021

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1 Plaintiff Cameron Dyess and Defendants Estate of Jajuan Lee Morton and PA Solutions,
2 Inc. (collectively “the Parties”), submit this stipulation to extend the deadline to mediate this
3 matter, subject to the Court’s approval, to the scheduled mediation date of September 9, 2021,
4 with mediator Harris Weinberg, as follows:

5 On March 1, 2021, the Court issued an Order Extending the Deadline to Mediate to
6 August 1, 2021 (Document 47) and removing the case from the court-sponsored mediation
7 program and referring it for private mediation.

8 The Parties agree and stipulate that an extension of the deadline to mediate is needed to
9 permit the Parties to complete necessary discovery, to permit Defendant PA Solutions, Inc.’s re-
10 filing and submission of its motion for summary judgment, and to permit the Parties to mediate
11 with their agreed mediator. The parties conferred on mediators and mediation dates and due to
12 pending trials in other matters, as well as mediator Weinberg’s availability, September 9, 2021,
13 is the first available mediation date.

14 The Parties agree and stipulate that an extension of the deadline to mediate to September
15 9, 2021, which is the scheduled date for mediation with Harris Weinberg, is needed to permit the
16 Parties to complete the discovery necessary for mediation.

17 The Parties agree and stipulate that this stipulation is made in good faith in the interests
18 of judicial economy and efficiency of resources of the Court and the Parties and is not for the
19 purposes of delay.

20 IT IS STIPULATED AND AGREED, by and between the parties and their undersigned
21 counsel of record, that the deadline to mediate be moved to September 9, 2021.

22 DATED: June 21, 2021

ERSKINE LAW, PC

23
24 BY: /s/ Jonathan M. Shugart

25 JONATHAN M. SHUGART, ESQ.

26 Attorneys for Plaintiff, CAMERON DYESS
27
28

1 DATED: June 21, 2021

LAW OFFICES OF JOHN A. HAUSER

2
3 BY: /s/ Laurie J. Elza

4 LAURIE J. ELZA, ESQ.

Attorneys for Defendant, PA SOLUTIONS, INC.

5
6 DATED: June 21, 2021

LEWIS BRISBOIS BISGAARD & SMITH, LLP

7
8 BY: /s/ Andrew C. Hubert

ANDREW C. HUBERT, ESQ.

Attorneys for Defendant, PA SOLUTIONS, INC.

9
10 DATED: June 21, 2021

KNUDTSON & ASSOCIATES, PC

11
12 BY: /s/ Gigi Knudtson

GIGI KNUDTSON, ESQ.

Attorneys for Defendant, ESTATE OF JAJUAN
LEE MORTON

13
14
15 **ORDER**

16 **IT IS SO ORDERED** that in light of this stipulation, the Court directs the parties to
17 complete private mediation by September 9, 2021.

18
19 DATED: 6/22/2021



HON. HAYWOOD S. GILLIAM, JR.

UNITED STATES DISTRICT COURT JUDGE